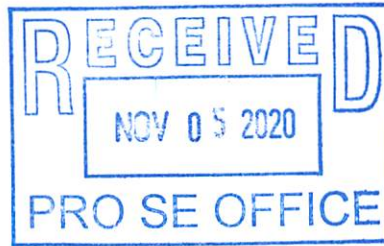


ORIGINAL

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York



**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ NOV 05 2020 ★  
BROOKLYN OFFICE

**Case No.: 1:19-cv-06791-RPK-ST**

Dear Judge Tiscione:

During my deposition I have answered to my best knowledge all question they have asked me and I have repeated that I did not do business with Star Subrau I only did business with Motor sport-advertising which, Doug Filardo represents! I have had only designed mailers based on his request and sent invoices to Motor sport advertising that is all. Payment always came from Motor sport. I have answered the same questions over and over since 2017.

Star lawyers have sent several times Private Investigators to my house and city to investigate me, my wife which, she has nothing to do with my previous business. They went around the city ask about my reputation which they had a good review as they said. Attached please see answers to different questions they keep changing and sent me by many emails.

I would like to ask Mr Jamie to stop sending his emails asking for the same thing and I repeatedly said I am busy till December 25<sup>th</sup> for health enrollment period. I do not have any different answers.

Thanks you Honor.  
John Alexander

United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
(718) 613-2665  
**ORDER CV-19-6791 (RPK)**

## **SCHEDULING**

I have no document to answer any of the below requests:

I have done business with Doug since I did business with Toyota across the street for newspaper and magazine.

I only did direct mail with Doug

Design the piece through the current promotion with Subaru of America

Doug APPROVE IT THEN HE CHOOSE THE MAILING LIST AND WE MAIL IT THROUGH DIFFERENT MAILING AGENCY TO THE TARGET MARKET.

Doug has a great response and continue to do business with the company then.

I retired the company in 2017 and left the building with all document and equipment, donate all furniture. My accountant Michael Shorry Died from Cancer 4years ago! I have no record with what soever any document.

All documents relating to the allegations contained in the Complaint.

I do not have any document related the the allegation.

- . All documents relating to the allegations contained in the Answer, including each affirmative defense. 6

I do not have any document related the the allegation.

All ESI, that relates to work performed by You for Star Auto Group.

I do not have any related document to work performance; the company out of business since 2017 and I never done business for Star Auto.

New Vision was just a vendor to Motor Sport Advertising to design a mailer.

All documents reflecting the amount of monies Defendants received for work purportedly performed by Defendants and/or Filardo for Star Auto Group, including but not limited to correspondence, personal deposit slips, cash receipts, bank records, payroll records, pay stubs, W-2 forms, 1099 forms.

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.

signatory

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.



deposited

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.

on which Group.

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.

transcripts, facsimiles, emails and related metadata (including but not limited to emails to and from both "john@nvadvertising.net" and "jalexander@myhst.com"), transmission records, text messages, instant messages, phone messages, voicemails, or audio or video tapes, and emails related to any communications between Defendants and Star Auto Group and/or Filardo concerning work to be performed for Star Auto Group and/or Filardo.

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.

All documents related to any agreements, invoices, bills, and/or receipts concerning work Defendants performed for Star Auto Group and/or Filardo.

I do not have any related document to previous work was presented to Douglas Filardo (Motor Sport Advertising) The company is no longer in business since 2017.

All of Defendants' federal and state tax returns from January 1, 2010 through the

I do not have any related document to tax return. All company document

was disposed since sitting down 2017.

All documents identifying every bank account to which Defendants are or were a from January 1, 2010 through the present.

I do not have any related document related bank transaction as was closed. You have hacked access to the bank account and showed me a copies of the transactions.

All bank records and statements related to bank accounts into which Defendants any monies they received from Filardo and/or Star Auto Group.

I never did business with Star Auto, or received any monies from this company. I do not have any related document related bank transaction as was closed. You have hacked access to the bank account and showed me a copies of the transactions

All documents reflecting any deposits into and withdrawals from any bank account Defendants are or were a signatory while performing work for Filardo and/or Star Auto

I never did business with Star Auto, or received any monies from this company. I do not have any related document related bank transaction as was closed. You have hacked access to the bank account and showed me a copies of the transactions

All documents and ESI, including, but not limited to, correspondence, notes,

I do not have any correspondence or notes. The company out of business since 2017.

All documents related to any agreements, invoices, bills, and/or receipts with any vendors or companies, related to the work Defendants performed for Star Auto Group and/or Filardo.



I do not have any related document to Invoices or agreement. The company is out of business since 2017

All documents concerning transfers of monies between Filardo and Defendants for work Defendants performed for Star Auto Group and/or Filardo.

I do not have any record off such documents. Douglas Filardo has it. You hacked the bank account and obtained a copy of statements between Motor Sport Advertising and NV production, you have showed it to me on our conference last month.

All documents showing all payments made by either of the Defendants to Star Auto Group, Filardo, or any other vendor/individual related to the work Defendants performed for Star Auto Group and/or Filardo.

I did not do payment or any transactions to or from Star Auto or done any business with!

All documents related to any mailings (or proof of mailings) that Defendants performed on behalf of Star Auto Group and/or Filardo.

I do not have any record of such documents. Douglas Filardo has it. You hacked the bank account and obtained a copy of statements between Motor Sport Advertising and NV production, you have showed it to me on our conference last month. NV no longer in business. All related documents to any work done to Motor Sport was delivered to Douglas Motor Sport Advertising and was satisfied

All documents related to communications between either of the Defendants and any other person concerning the allegations contained in the Complaint, including, but not limited to ESI, letters, emails, facsimiles, text messages, instant messages, or audio or videotapes.

I do not have any record of such documents. All business was done and received by Motor Sport Advertising related to designed mailers.

All ESI and documents concerning the business status of any entity

Defendants' created or have/had an interest in, including, but not limited to filings within Florida, New York, and New Jersey Department of State (e.g. articles of incorporation, request for tax identification number) or any other state.

I do not have any record of such documents. All business was done and received by Motor Sport Advertising related to designed mailers.

All documents, calendars, diaries, or notes of events maintained by either of the Defendants relating to the work Defendants performed for Star Auto Group and/or Filardo.

I do not have any record of such documents. All business was done and received by Motor Sport Advertising related to designed mailers.

All documents, exhibits and other tangible evidence which Defendants will proffer as evidence in trial in this matter. In response to this request, please identify and produce only documents which have not been produced in response to a prior request contained herein.

I do not have any record of such documents. All business was done and received by Motor Sport Advertising related to designed mailers.

All documents that relate to any lawsuit or other legal proceeding to which either of the Defendants are or have been a party, including both civil and criminal.

I do not have any document related to any lawsuit and I never been in one before.

All documents related to work Defendants performed for Star Auto Group and/or Filardo related to television advertisements.

I do not have any document related to any work performed to Star Auto. We never done a television advertising to Motor Sport, only produced a video.



All documents related to communications between Defendants and Valassis Communications, Inc. related to Star Auto Group and/or Filardo concerning work for Star Auto Group.

I do not have any document related to any communication. All documents related to company was disposed since the company out of business.

All documents regarding Nagwa Youseif's position as Executive Producer with New Vision and NV as previously indicated on New Vision's website, "www.nvadvertising.net". Any documents discovered or received subsequent to your response shall be furnished to

Nagwa Youssef never worked for the company, or had any partnership with the company in the past. She only consulted for TV production as reporter once.



I don't understand your response. I made 24 requests for documents at your deposition which I memorialized in an email to you after your deposition. The judge ordered you to respond to each of them. What you sent is not responsive to these 24 requests, which, again, were the following:

These are different than the question you have asked before the last session! YOU KEEP COMING UP WITH DIFFERENT QUESTION! Have answered all your questions and i do not have any record of any realted document to previous business. Been out of business since 2017 , all document were sent to Motorsport Advertising Doug Filardo.

1. Copy of your current passport / **do not have one**
2. Copy of your current driver's license. / **this is not related to your case!**
3. All communications and documents, including, but not limited to, correspondence, notes, transcripts, facsimiles, emails and related metadata (including but not limited to emails to and from both "[john@nvadvertising.net](mailto:john@nvadvertising.net)" and "[jalexander@myhst.com](mailto:jalexander@myhst.com)"), transmission records, text messages, instant messages, phone messages, voicemails, or audio or video tapes, and emails related to any communications between you and Ansira concerning work to be performed for Star Auto Group and/or Filardo. / **I do not have any related document to previous business**
4. All communications (including but not limited to emails and text messages) between you and Douglas Filardo and/or Motorsports Advertising concerning Star Auto Sales of Queens LLC, including but not limited to, services you and or New Vision Advertising performed for Star Auto Sales of Queens LLC on behalf of Douglas Filardo and/or Motorsports Advertising. / **I do not have any related document to previous business**
5. All communications (including but not limited to emails and text messages) between you and Douglas Filardo and/or Motorsports Advertising concerning the lawsuit filed by Star Auto Sales of Queens LLC against you. / **I do not have any related document to previous business**

6. All documents received by New Vision Advertising and/or Hanie Iskander from Subaru's corporate office authorizing the use of certain images in advertisements for Star Subaru. /I do not have any related document to previous business
7. The double-sided document you were viewing during your deposition that lists New Vision Advertising's clients. You can find it on the previous website.
8. Complete the attached 4506-T so that we can obtain the tax returns for New Vision Advertising for 2010-2016. I do not have any related document to previous business
9. Tax returns for Hanie Iskander/John Alexander since 2010. If you do not have any of the tax returns, complete a form 4506-T and provide to me. I do not have any related document to previous business
10. Tax returns for Nagwa Youseif since 2010. If you do not have any of the tax returns, complete a form 4506-T and provide to me. She never been involved in business at all. I have no idea where you get that from.
11. Copy of insurance licenses. I do not have any related document to previous business
12. The full names, last known addresses, and phone numbers for Kristy and Anita, the two office employees that worked on Star Subaru for New Vision Advertising I do not have any related document to previous business employees.
13. All checks issued to Kristy and Anita I do not have any related document to previous business
14. The names, addresses and telephone numbers of the four (4) companies that performed mailings for New Vision Advertising I do not have any related document to previous business either I have record of
15. Cell phone records establishing all communications with Douglas Filardo. I do not have any record of previous business since 2017
16. Sample of an invoice for New Vision Advertising. I do not have any related document to previous business but I told you many times how it looks like.
17. The bank account number for Nagwa Youseif's Bank of America



account. She never been involved in business neither any transactions.

18. The bank account number for New Vision's Wells Fargo account. You hacked that account and you have the statement already which you showed me last time.
19. All documents related to the payment/transfer of money from Motorsports Advertising, Douglas Filardo, and/or Francine Filardo to New Vision Advertising and or Hanie Iskander/John Alexander. I do not have any related document to previous business.
20. All bank records and statements related to deposits into and withdrawals from any bank account onto which the defendants and/or New Vision Advertising are or were a signatory while performing work for Douglas Filardo/Motorsports Advertising I do not have any related document to previous business
21. All documents, including, but not limited to, correspondence, notes, transcripts, facsimiles, emails and related metadata (including but not limited to emails to and from both "john@nvadvertising.net" and "jalexander@myhst.com"), transmission records, text messages, instant messages, phone messages, voicemails, or audio or video tapes, and emails related to any communications between Defendants and Star Auto Group and/or Filardo concerning work to be performed for Star Auto Group and/or Filardo. I do not have any related document to previous business
22. All documents related to any lawsuit or criminal proceedings in which you were involved. I do not have any related document.
23. All documents regarding Nagwa Youseif's position as Executive Producer with New Vision and NV as previously indicated on New Vision's website, "www.nvadvertising.net" She never been in position with the company. Website was for advertising purpose only not a work contract
24. All screenshots you took of Plaintiff's documents during your deposition. What screenshots?

Before I write to the court, please confirm that you will not respond to



these 24 requests.

I wish that will help you

John Alexander  
8259 Enclave way  
Unit 103  
Sarasota FL 34243

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